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September 19, 2025

Via ECF

Honorable Eric N. Vitaliano
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Javier Aguilar, Case No. 20-cr-00390-ENV

Dear Judge Vitaliano:

We write on behalf of defendant Javier Aguilar to respectfully request that his sentencing, currently scheduled for November 7, 2025, be adjourned to a date in January 2026 that is convenient for the Court. The government will only consent to a two-week adjournment.

The reason for this request is due to numerous professional and personal conflicts of both sets of Mr. Aguilar's attorneys. The current schedule requires that the defendant's sentencing submission be due on October 29. As the Court is aware, neither of the undersigned counsel represented Mr. Aguilar at trial. As such, meaningful preparation for sentencing requires a thorough review of the record and the development of arguments that involve significant legal complexity. Given counsel's scheduling conflicts, counsel needs additional time to submit their sentencing submission to provide effective assistance of counsel. Should the court need more detail regarding the personal conflicts necessitating this adjournment, counsel requests that the information be provided *in camera*.

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For foregoing reasons, we respectfully request that Mr. Aguilar's sentencing be adjourned to a date in January that is convenient for the Court.

Respectfully submitted,

/s/ Celia Cohen

/s/Marjorie Pearce

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